

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

GASTON BROWNE CORRUPTION  
DISCOVERY APPLICATION

Case No. 1:25-mc-00098

**DECLARATION OF DAN G. BOYLE IN SUPPORT OF APPLICATION UNDER  
28 U.S.C. § 1782 TO TAKE DISCOVERY IN THIS DISTRICT FOR USE IN FOREIGN  
PROCEEDINGS**

I, Dan G. Boyle, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 the foregoing is true and correct:

1. I am an attorney duly admitted to practice law in New York and California. I am a partner at the law firm Boies Schiller & Flexner LLP, and I represent Yulia Guryeva-Motlokhov (“Applicant”).

2. I make this declaration in support of the Applicant’s parallel applications under 28 U.S.C. § 1782 to take discovery from The Clearing House Payments Company L.L.C. (“CHIPS”), The Federal Reserve Bank of New York (“Fed-NY”), and Northrop & Johnson Yachts-Ships LLC (“Northrop,” and collectively with CHIPS and Fed-NY, the “Discovery Subjects.”

3. The discovery sought will support pending foreign proceedings in Antigua (the “Antiguan Proceedings”) and Russia (the “Russian Proceedings”) and contemplated criminal proceedings in the United Arab Emirates (the “Contemplated Criminal Proceedings”).

4. Except as otherwise indicated, all statements in this Declaration are based on my personal knowledge and experience, or upon my discussions with or review of work product of other counsel working on behalf of Applicant.

5. Insofar as they are within my own knowledge, the facts and matters set forth herein are, to the best of my own knowledge and belief, true.

6. In making this Declaration I do not waive any applicable legal privileges.

7. To the best of my knowledge, CHIPS and Fed-NY are subject to the jurisdiction of the U.S. District Court for the Southern District of New York, and Northrop is subject to the jurisdiction of the U.S. District Court for the Southern District of Florida, for purposes of a judicial assistance motion under 28 U.S.C. § 1782.

8. Attached hereto as Exhibit 1 is a true and correct copy of a judgment from the Eastern Caribbean Supreme Court, Antigua and Barbuda, in the High Court of Justice, in the case of *Flying Dutchman Overseas Limited and Vita Felice Limited v. The Port Authority and The Attorney General* (“*Flying Dutchman v. Antigua I*”), dated June 8, 2023.

9. Attached hereto as Exhibit 2 is a true and correct copy of a judgment from the Eastern Caribbean Supreme Court, Court of Appeal, in the case of *Gurieva-Motlokhov v. The Port Manager of the Port Authority of Antigua and Barbuda, The Director of the Antigua and Barbuda Department of Marine Services and Merchant Shipping, and The Attorney General of Antigua and Barbuda* (“*Guryeva v. Antigua*”), dated November 22, 2023.

10. Attached hereto as Exhibit 3 is a true and correct copy of a ruling from the Eastern Caribbean Supreme Court, Antigua and Barbuda, in the High Court of Justice, in the case of *Warren Halle v. The Port Manager of the Port Authority of Antigua and Barbuda, The*

*Government of Antigua and Barbuda, and The Attorney General of Antigua and Barbuda (“Halle v. Antigua”)*, dated July 26, 2023.

11. Attached hereto as Exhibit 4 is a true and correct copy of a settled draft order from the Eastern Caribbean Supreme Court, Antigua and Barbuda, in the High Court of Justice, in the cases *Flying Dutchman Ltd. and Vita Felice Ltd. v. The Port Manager of the Antigua & Barbuda Port Authority and The Attorney General (“Flying Dutchman v. Antigua II”)* and *Guryeva v. Antigua*, dated July 22, 2024.

12. Attached hereto as Exhibit 5 is a true and correct copy of a settled draft order from the Eastern Caribbean Supreme Court, Antigua and Barbuda, in the High Court of Justice, in *Flying Dutchman v. Antigua II*, dated August 12, 2024.

13. Attached hereto as Exhibit 6 is a true and correct copy of an affidavit from Rasona Davis-Crump, dated July 25, 2024.

14. Attached hereto as Exhibit 7 is a true and correct copy of a supplemental affidavit from Rasona Davis-Crump, dated August 16, 2024.

15. Attached hereto as Exhibit 8 is a true and correct copy of an application under 28 U.S.C. § 1782 filed by the United States to secure bank records for a criminal investigation by the Government of Antigua and Barbuda, dated January 14, 2005.

16. Attached hereto as Exhibit 9 is a true and correct copy of an article from OffshoreAlert, dated October 31, 2002.

17. Attached hereto as Exhibit 10 is a true and correct copy of a list of Antiguan and Barbudan diplomatic passport holders, dated July 12, 2017, obtained from the Website IMI Daily, dated July 14, 2017, available at <https://www.imidaily.com/most-read-stories/antigua-govt-releases-full-list-of-diplomatic-passport-holders-includes-robert-de-niro-drug-traffickers/>.

18. To the best of my knowledge, CHIPS is headquartered at 1114 Avenue of The Americas, 17th Floor, New York, New York 10036.

19. To the best of my knowledge, Fed-NY is headquartered at 33 Liberty Street New York, NY 10045.

20. Attached hereto as Exhibit 11 is a true and correct copy of a proposed subpoena for documents to be served on CHIPS.

21. Attached hereto as Exhibit 12 is a true and correct copy of a proposed subpoena for documents to be served on Fed-NY.

22. Attached hereto as Exhibit 13 is a true and correct copy of a proposed subpoena for documents to be served on Northrop.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: Los Angeles, CA  
March 5, 2025

/s/  
**Dan G. Boyle, Esq.**